August 7, 2003

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Oscar Hernandez, Director Risk Assessment Division Office of Pollution Prevention and Toxics U.S. Environmental Protection Agency 1201 Constitution Avenue N.W. Washington, DC 20460-0001

RE: Response to EPA and Other Comments on the Olefins Panel Test Plan for Low Benzene Naphthas Category, HPV Registration No.

On December 19, 2001, the American Chemistry Council Olefins Panel (Panel) submitted a test plan on the Low Benzene Naphthas Category under the HPV Chemical Challenge Program. In a letter dated August 20, 2002, you raised presented several questions about the Panel's test plan. Subsequently, several Panel scientists met with Mr. Richard Hefter, Chief of the HPV Chemicals Branch and other EPA staff members to discuss the issues raised in your letter. EPA's comments, as the Panel understands them, focus on the presentation and clarity of the test plan, rather than on the plan itself. The Panel is submitting the attached Revised Test Plan, which we believe improves the presentation and clarity of the Test Plan consistent with EPA's comments. In addition, we are submitting Robust Summaries which have been revised to address your comments. In preparing these revised documents, the Panel also reviewed comments filed by other commenters.

The Panel believes that this letter and the revised Test Plan and Robust Summaries address the issues raised in your letter. However, if you have additional questions, please contact me at 301 924 2006 or Elizabeth Moran@americanchemistry.com.

Yours truly,

Elizabeth J. Moran, Ph.D. Manager, Olefins Panel

Attachments

cc: Richard Hefter